

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES,  
Plaintiff,

vs.

Case: 2:22-cr-20504  
Judge: Borman, Paul D.

AWS Mohammed Naser,  
Defendant, Pro se,

RECEIVED  
DEC 16 2022  
PAUL D. BORMAN  
U.S. DISTRICT JUDGE

FILED  
DEC 16 2022  
CLERK'S OFFICE  
U.S. DISTRICT COURT

MOTION TO DISMISS  
18 U.S.C 922(g)(1)

Defendant moves this court for the following reasons:

- 1- Clear & Present 4th Amendment violations.  
Fraudulent representation, deception & coercion.  
United States v. Hurston, 12 F. Supp 2d 630,  
637.
- 2- Bad search warrants where officer's lied or  
omitted information from the affidavit for  
the warrant leads for a Franks hearing.  
United States v. Burton, 288 F.3d 91, 104



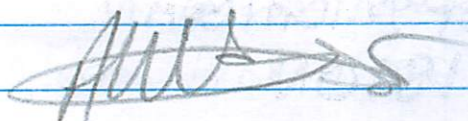
3- Government is making every excuse under the sun to withhold affidavit for the warrant GPS / wire Taps it filed on defendant. Leaving only one logical explanation, they lied.

4- lack of specificity, records requested, location to be searched, & the need for Probable Cause that evidence of Criminal activity in the Place to be searched.

5 - Context in which term "Combination" is used in 26 USC 5845 (F)(3) clearly indicates that Congress meant an association of the components of a destructive device, at the same time & place, capable of being converted into a destructive device. Complete absence of explosive material would prevent component parts in defendant's possession (House hold items) from being "Destructive device"

United States v. Malone, 546 F.2d 1182, 1977 U.S.

To Conclude this Change has no merit or standing & should be thrown out.



11-12-2022

Aws M. Naser

Aug 11 11:11 AM '22

Midland County Jail

Midland, MI 48642

105 East Ice Dr.

Midland, MI 48642

U.S.

MAILS

U.S. District Court

Eastern District of MI

Clark of Judge Borman, Paul D.

231 W. Lafayette Blvd

Detroit, MI 48226

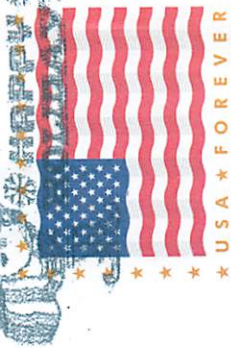
RECEIVED

DEC 16 2022

PAUL D. BORMAN  
U.S. DISTRICT JUDGE

2500 00223922443 PROPLEX MI 480

12 DEC 2022 PM 3 L





THIS ENVELOPE IS RECYCLABLE AND MADE WITH 30% POST CONSUMER CONTENT

